

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

DARKPULSE, INC.,

*Plaintiff,*

v.

FIRSTFIRE GLOBAL OPPORTUNITIES  
FUND, LLC, and ELI FIREMAN,

*Defendants.*

Civil Action No. 1:21-cv-11222-ER

**EMERGENCY SUPPLEMENTAL  
DECLARATION OF DENNIS O'LEARY  
28 U.S.C. § 1746 IN SUPPORT FOR  
PRELIMINARY INJUNCTION**

1. I, Dennis O'Leary, am the Chief Executive Officer and a Chairman of the Board of Darkpulse, Inc. ("Darkpulse"), plaintiff in the above-captioned matter.

2. I make this Declaration upon personal knowledge, information, and belief, including information contained in Darkpulse's business records and information reported to me by other Darkpulse employees. I would testify as stated herein if called to do so.

3. I write this Emergency Supplemental Declaration to supplement my Declaration in support of Darkpulse's motion for preliminary injunction and temporary restraining order filed on January 14, 2021. *See* ECF No. 12-2.

4. Darkpulse's Common Shares are listed and traded on the OTC market under the symbol "DPLS."

5. On December 31, 2021, Darkpulse filed its complaint in the United States District Court for the Southern District of New York. *See* ECF No. 1.

6. On January 13, 2022, counsel for FirstFire Global Opportunities Fund, LLC ("FirstFire") and Eli Fireman ("Fireman" and together with FirstFire, the "Defendants") executed

a Waiver of the Service of Summons for both Defendants. *See* ECF Nos. 10 & 11.

7. On January 13, 2022, Darkpulse's trading volume was 33,846,106. *See* Historical Data annexed hereto as **Exhibit A**.

8. On January 14, 2022, just one day after the Defendants were notified of this action, Darkpulse's trading volume increased to 89,943,435 from 33,846,106, a 56,097,329 increase from the previous day. *See* Historical Data annexed hereto as **Exhibit A**.

9. As referenced in my prior declaration dated January 14, 2022, FirstFire effectuated a conversion for the entire debt due under the convertible promissory note on November 15, 2021, by which it wrongfully acquired over 177 million shares of freely trading DarkPulse stock. Upon information and belief, FirstFire immediately dumped over 50 million shares to purposefully injure Darkpulse.

10. The 56,097,329 share volume difference resulted in a market capital of 4,928,900.24, with an ultimate market loss of \$3,175,671.95 to Darkpulse. *See* Market Capital Spreadsheet annexed hereto as **Exhibit B**.

\* \* \*

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 17, 2022

/s/ Dennis O'Leary  
DENNIS O'LEARY